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Attorneys for Non-party
Juniper Networks, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CISCO SYSTEMS, INC.,

Plaintiff,

v.

ARISTA NETWORKS, INC.,

Defendant.

) Case No. 5:14-cv-05344-BLF (PSG)

)
) **DECLARATION OF JOSHUA GLUCOFT**
) **ON BEHALF OF NONPARTY JUNIPER**
) **NETWORKS, INC. IN SUPPORT OF**
) **CISCO SYSTEMS, INC.'S**
) **ADMINISTRATIVE MOTION TO FILE**
) **DOCUMENTS UNDER SEAL RE: DKT.**
) **NO. 323**

) Judge: Hon. Beth Labson Freeman
)
)
)

DECLARATION OF JOSHUA GLUCOFT

I, Joshua Glucoft, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel for non-party Juniper Networks, Inc. (“Juniper”) with respect to the third-party subpoena served by defendant Arista Networks, Inc. (“Arista”) in the above-captioned matter. I am a member in good standing of the State Bar of California and have been admitted to practice before this Court. Where expressly indicated, I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I submit this declaration in support of Cisco Systems, Inc.’s (“Cisco”) Administrative Motion to File Documents Under Seal (Docket No. 323), which moves the Court for an order to file under seal the following item related to non-party Juniper:

- Pages 178-79 of Exhibit L to the Declaration of Andrew M. Holmes in Support of Cisco’s Motion for Protective Order.

In this declaration, I explain why the material cited above is sealable pursuant to Civil Local Rule 79-5 and provide additional facts in support of Cisco’s Administrative Motion to File Documents Under Seal to the extent that the administrative motion pertains to Juniper.

3. Pages 178-79 of Exhibit L contain direct citations of and references to the deposition of Phil Kasten as Juniper’s corporate designee pursuant to a subpoena served on Juniper by Arista. The transcript reflects substantive discussion of the technical development of Juniper’s highly proprietary software and source code—which contains much information that Juniper maintains as trade secrets. Juniper expends significant effort in maintaining the secrecy of its software and source code development, including, for example, implementing strict screening procedures for visitors to its engineering campus. Public disclosure of essential nonpublic facts about Juniper’s software and source code development could materially impair Juniper’s intellectual property rights and could cause serious competitive consequences to Juniper’s business positioning.

4. For these reasons, there is good cause to seal pages 178-79 of Exhibit L.

[Signature page follows]

1 Executed on July 6, 2016, at Los Angeles, California.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct to the best of my knowledge.

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5 /s/ Joshua Glucoft

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